

NOTICE OF OBJECTION TO CONFIRMATION

WELLS FARGO BANK, N.A. has filed papers with the Court to object to the Confirmation of the Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to object to the Confirmation of the Chapter 13 Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

File with the Court an answer, explaining your position at:

**Clerk
U.S. Bankruptcy Court
50 Walnut Street, 3rd Floor
Newark, NJ 07102**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103

MARIE-ANN GREENBERG, Trustee
30 TWO BRIDGES ROAD, SUITE 330
FAIRFIELD, NJ 07004

Attend the hearing scheduled to be held on 07/18/2019 in the NEWARK Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court
50 Walnut Street, 3rd Floor
Newark, NJ 07102**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: June 21, 2019

/s/ Robert J. Davidow
Robert J. Davidow, Esq.
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
Tel: 856-813-5500 Ext. 47960
Fax: 856-813-5501
Email: Robert.Davidow@phelanhallinan.com

File No. 826604

Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard
Philadelphia, PA 19103
856-813-5500
FAX Number 856-813-5501
WELLS FARGO BANK, N.A.

In Re:

LUIS R. SOLANO

Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE

Chapter 13

Case No. 19-11906 - VFP

Hearing Date: 07/18/2019

The undersigned, Phelan Hallinan Diamond & Jones, PC, attorneys for Secured Creditor, WELLS FARGO BANK, N.A., the holder of a Mortgage on debtors residence located at 667 SUMMIT ROAD, UNION, NJ 07083 hereby objects to the Confirmation of the debtors proposed Chapter 13 Plan on the following grounds:

1. On April 18, 2019, Movant filed Proof of Claim listing pre-petition arrears in the amount of \$81,495.30. A copy of the Proof of Claim is attached hereto as Exhibit "A" and made a part hereof.
2. Debtors' Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5). A copy of the Debtor's Plan is attached hereto as Exhibit "B" and made a part hereof.
3. Debtors' Plan currently provides for payment to Movant in the amount of \$79,026.16.

4. Movant objects to Debtors' Plan as it is underfunded. Debtors' Plan should be amended to fully fund the arrears owed to Movant. Confirmation of Debtor's proposed Plan should be denied.

WHEREFORE, WELLS FARGO BANK, N.A. respectfully requests that the Confirmation of Debtors Plan be denied.

/s/ Robert J. Davidow

Robert J. Davidow, Esq.

Phelan Hallinan Diamond & Jones, PC

1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103

Tel: 856-813-5500 Ext. 47960

Fax: 856-813-5501

Email: Robert.Davidow@phelanhallinan.com

Dated: June 21, 2019

EXHIBIT A

Fill in this information to identify the case:

Debtor 1 Luis R Solano

Debtor 2

(Spouse, if filing)

United States Bankruptcy Court for the: Main District of New Jersey

Case number 19-11906-VFP

Read the instructions before filling out this form. Use this form to make a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571. Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Official Form 410

Proof of Claim

04/16

Part 1: Identify the Claim

1. **Who is the current creditor?** Wells Fargo Bank, N.A.

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor

2. **Has this claim been acquired from someone else?** ☒ No
☐ Yes. From whom?

3. **Where should notices and payments to the creditor be sent?**

Where should notices to the creditor be sent?

Wells Fargo Bank, N.A.
 Default Document Processing
 MAC# N9286-01Y

Federal Rule of
 Bankruptcy Procedure
 (FRBP) 2002(g)

Where should payments to the creditor be sent? (if different)

Wells Fargo Bank, N.A.
 Attention: Payment Processing
 MAC# F2302-04C

Name

1000 Blue Gentian Road

Number

Street

Eagan MN 55121-7700

City

State

ZIP Code

Contact phone 800-274-7025

Contact email

POCNOTIFICATIONS@WELLSFARGO.COM

Name

1 Home Campus

Number

Street

Des Moines IA 50328

City

State

ZIP Code

Contact phone 800-274-7025

Contact email

POCNOTIFICATIONS@WELLSFARGO.COM

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

WF C M G E 1 9 1 1 9 0 6 N J M 7 4 8 9 5 4 4 5

4. Does this claim amend ☐ No
one already filed? ☒ Yes. Claim number on court claims registry (if known) 5-1 Filed on 03/07/2019
MM/DD/YYYY
5. Do you know if anyone ☒ No
else has filed a proof ☐ Yes. Who made the earlier filing? _____
of claim for this claim?

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number ☐ No
you use to identify the ☒ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 5445
debtor?
7. How much is the claim? \$ 456,455.52 Does this amount include interest or other charges?
☐ No
☒ Yes. Attach statement itemizing interest, fees, expenses, or other
charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as healthcare information.
Money Loaned
9. Is all or part of the claim ☐ No
secured? ☒ Yes. The claim is secured by a lien on property.
Nature of property:
☒ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: 667 SUMMIT RD UNION NJ 07083

Basis for perfection: Recorded Mortgage/Deed of Trust

Attach redacted copies of documents, if any that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ 456,455.52
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ 81,495.30
Annual Interest Rate(when case was filed) 3.75 %
☒ Fixed
☐ Variable
☐ Fixed with Steps due to loan modification
10. Is this claim based on a ☒ No
lease? ☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a ☒ No
right of setoff? ☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

- ☒ No
☐ Yes. Check all that apply:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

- ☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).
☐ Up to \$2,850* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).
☐ Wages, salaries, or commissions (up to \$12,850*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).
☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).
☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).
☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____
 \$ _____
 \$ _____
 \$ _____
 \$ _____
 \$ _____

* Amounts are subject to adjustment on 4/1/19 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

Check the appropriate box:

- ☒ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 04/18/2019
 MM / DD / YYYY

/S/ Courtney Laughner

Signature

Print the name of the person who is completing and signing this claim:

Name Courtney Laughner

First name Middle name Last name

Title Vice President Loan Documentation

Company Wells Fargo Bank, N.A.

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

Number Street

City State ZIP Code

Contact phone

Email

Mortgage Proof of Claim Attachment

(12/15)

If you file a claim secured by a security interest in the debtor’s principal residence, you must use this form as an attachment to your proof of claim. See separate instructions.

Part 1: Mortgage and Case Information		Part 2: Total Debt Calculation		Part 3: Arrearage as of Date of the Petition		Part 4: Monthly Mortgage Payment	
Case number:	19-11906-VFP	Principal balance:	393,945.05	Principal & interest due:	49,391.76	Principal & interest:	1,496.72
Debtor 1:	Luis R Solano	Interest due:	35,896.33	Prepetition fees due:	4,696.02	Monthly escrow:	843.02
Debtor 2:		Fees, costs due:	4,696.02	Escrow deficiency for funds advanced:	21,918.12	Private mortgage insurance:	0.00
Last 4 digits to identify:	5445	Escrow deficiency for funds advanced:	21,918.12	Projected escrow shortage:	5,489.40	Optional Products:	0.00
Creditor:	Wells Fargo Bank, N.A.	Other:	0.00	Other:	0.00		
Servicer:	N/A	Less total funds on hand: –	0.00	Less funds on hand: –	0.00	Total monthly payment:	2,339.74
Fixed accrual/daily simple interest/other:	Fixed Accrual	Total debt:	456,455.52	Total prepetition arrearage:	81,495.30	*Additional changes to the monthly payment amount may be required because interest rate adjustments or escrow requirement changes.	
		*Not to be used for payoff purposes The principal balance includes a second loan of \$55,959.46 for which interest is deferred and cannot be collected on the proof of claim.					

Part 5 : Loan Payment History from First Date of Default

Account Activity					How Funds Were Applied/Amount Incurred							Balance After Amount Received or Incurred				
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.	L.	M.	N.	O.	P.	Q.
Date	Contractual payment amount	Funds received	Amount incurred	Description	Contractual due date	Prin, int & esc past due balance	Amount to principal	Amount to interest	Amount to escrow	Amount to fees or charges	Unapplied funds	Principal balance	Accrued interest balance	Escrow balance	Fees / Charges balance	Unapplied funds balance
10/01/2015				Beginning Balances	10/01/2015	0.00						344,463.60	0.00	-51,153.39	0.00	0.00
10/01/2015	2,320.26			Monthly payment	10/01/2015	2,320.26						344,463.60	0.00	-51,153.39	0.00	0.00
10/12/2015		-244.47		Miscellaneous escrow disbursement	10/01/2015	2,320.26	0.00	0.00	-244.47		0.00	344,463.60	0.00	-51,397.86	0.00	0.00
10/16/2015			59.87	Late Charge	10/01/2015	2,320.26				59.87		344,463.60	0.00	-51,397.86	59.87	0.00
10/29/2015			2,015.63	City tax disbursement	10/01/2015	2,320.26	0.00	0.00	-2,015.63		0.00	344,463.60	0.00	-53,413.49	59.87	0.00
11/01/2015	2,320.26			Monthly payment	10/01/2015	4,640.52						344,463.60	0.00	-53,413.49	59.87	0.00
11/16/2015			59.87	Late Charge	10/01/2015	4,640.52				59.87		344,463.60	0.00	-53,413.49	119.74	0.00
12/01/2015	2,320.26			Monthly payment	10/01/2015	6,960.78						344,463.60	0.00	-53,413.49	119.74	0.00
12/16/2015			59.87	Late Charge	10/01/2015	6,960.78				59.87		344,463.60	0.00	-53,413.49	179.61	0.00
01/01/2016	2,320.26			Monthly payment	10/01/2015	9,281.04						344,463.60	0.00	-53,413.49	179.61	0.00
01/12/2016			1,998.52	City tax disbursement	10/01/2015	9,281.04	0.00	0.00	-1,998.52		0.00	344,463.60	0.00	-55,412.01	179.61	0.00

Mortgage Proof of Claim Attachment: Additional Page

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Case number:19-11906-VFP

Debtor 1:Luis R Solano

Part 5 : Loan Payment History from First Date of Default

Account Activity				How Funds Were Applied/Amount Incurred								Balance After Amount Received or Incurred				
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.	L.	M.	N.	O.	P.	Q.
Date	Contractual payment amount	Funds received	Amount incurred	Description	Contractual due date	Prin, int & esc past due balance	Amount to principal	Amount to interest	Amount to escrow	Amount to fees or charges	Unapplied funds	Principal balance	Accrued interest balance	Escrow balance	Fees / Charges balance	Unapplied funds balance
01/19/2016			59.87	Late Charge	10/01/2015	9,281.04				59.87		344,463.60	0.00	-55,412.01	239.48	0.00
02/01/2016	2,315.64			Monthly payment	10/01/2015	11,596.68						344,463.60	0.00	-55,412.01	239.48	0.00
02/18/2016			400.00	Title costs	10/01/2015	11,596.68				400.00		344,463.60	0.00	-55,412.01	639.48	0.00
02/22/2016			892.50	Attorney's fees	10/01/2015	11,596.68				892.50		344,463.60	0.00	-55,412.01	1,531.98	0.00
02/22/2016			100.00	Title costs	10/01/2015	11,596.68				100.00		344,463.60	0.00	-55,412.01	1,631.98	0.00
03/01/2016	2,315.64			Monthly payment	10/01/2015	13,912.32						344,463.60	0.00	-55,412.01	1,631.98	0.00
03/03/2016			1,875.73	Hazard Insurance Disbursement	10/01/2015	13,912.32	0.00	0.00	-1,875.73		0.00	344,463.60	0.00	-57,287.74	1,631.98	0.00
04/01/2016	2,315.64			Monthly payment	10/01/2015	16,227.96						344,463.60	0.00	-57,287.74	1,631.98	0.00
04/19/2016			250.00	Filing fees and court costs	10/01/2015	16,227.96				250.00		344,463.60	0.00	-57,287.74	1,881.98	0.00
04/20/2016			595.00	Attorney's fees	10/01/2015	16,227.96				595.00		344,463.60	0.00	-57,287.74	2,476.98	0.00
04/21/2016			1,593.56	City tax disbursement	10/01/2015	16,227.96	0.00	0.00	-1,593.56		0.00	344,463.60	0.00	-58,881.30	2,476.98	0.00
04/22/2016			40.00	Recording fees	10/01/2015	16,227.96				40.00		344,463.60	0.00	-58,881.30	2,516.98	0.00
04/29/2016			595.00	Attorney's fees	10/01/2015	16,227.96				595.00		344,463.60	0.00	-58,881.30	3,111.98	0.00
05/01/2016	2,315.64			Monthly payment	10/01/2015	18,543.60						344,463.60	0.00	-58,881.30	3,111.98	0.00
06/01/2016	2,315.64			Monthly payment	10/01/2015	20,859.24						344,463.60	0.00	-58,881.30	3,111.98	0.00
07/01/2016	2,315.64			Monthly payment	10/01/2015	23,174.88						344,463.60	0.00	-58,881.30	3,111.98	0.00
07/14/2016			2,118.42	City tax disbursement	10/01/2015	23,174.88	0.00	0.00	-2,118.42		0.00	344,463.60	0.00	-60,999.72	3,111.98	0.00
08/01/2016	2,315.64			Monthly payment	10/01/2015	25,490.52						344,463.60	0.00	-60,999.72	3,111.98	0.00
09/01/2016	2,315.64			Monthly payment	10/01/2015	27,806.16						344,463.60	0.00	-60,999.72	3,111.98	0.00
10/01/2016	2,315.64			Monthly payment	10/01/2015	30,121.80						344,463.60	0.00	-60,999.72	3,111.98	0.00
10/11/2016			50.00	Filing fees and court costs	10/01/2015	30,121.80				50.00		344,463.60	0.00	-60,999.72	3,161.98	0.00
10/17/2016		-697.79		Miscellaneous escrow disbursement	10/01/2015	30,121.80	0.00	0.00	-697.79		0.00	344,463.60	0.00	-61,697.51	3,161.98	0.00

Mortgage Proof of Claim Attachment: Additional Page

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Case number:19-11906-VFP

Debtor 1:Luis R Solano

Part 5 : Loan Payment History from First Date of Default

Account Activity				How Funds Were Applied/Amount Incurred								Balance After Amount Received or Incurred				
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.	L.	M.	N.	O.	P.	Q.
Date	Contractual payment amount	Funds received	Amount incurred	Description	Contractual due date	Prin, int & esc past due balance	Amount to principal	Amount to interest	Amount to escrow	Amount to fees or charges	Unapplied funds	Principal balance	Accrued interest balance	Escrow balance	Fees / Charges balance	Unapplied funds balance
10/24/2016			2,013.33	City tax disbursement	10/01/2015	30,121.80	0.00	0.00	-2,013.33		0.00	344,463.60	0.00	-63,710.84	3,161.98	0.00
11/01/2016	2,305.44			Monthly payment	10/01/2015	32,427.24						344,463.60	0.00	-63,710.84	3,161.98	0.00
12/01/2016	2,305.44			Monthly payment	10/01/2015	34,732.68						344,463.60	0.00	-63,710.84	3,161.98	0.00
12/09/2016			595.00	Attorney's fees	10/01/2015	34,732.68				595.00		344,463.60	0.00	-63,710.84	3,756.98	0.00
01/01/2017	2,305.44			Monthly payment	10/01/2015	37,038.12						344,463.60	0.00	-63,710.84	3,756.98	0.00
01/19/2017			2,032.20	City tax disbursement	10/01/2015	37,038.12	0.00	0.00	-2,032.20		0.00	344,463.60	0.00	-65,743.04	3,756.98	0.00
01/24/2017			405.00	Attorney's fees	10/01/2015	37,038.12				405.00		344,463.60	0.00	-65,743.04	4,161.98	0.00
02/01/2017	2,305.44			Monthly payment	10/01/2015	39,343.56						344,463.60	0.00	-65,743.04	4,161.98	0.00
03/01/2017	2,305.44			Monthly payment	10/01/2015	41,649.00						344,463.60	0.00	-65,743.04	4,161.98	0.00
03/02/2017			1,778.00	Hazard Insurance Disbursement	10/01/2015	41,649.00	0.00	0.00	-1,778.00		0.00	344,463.60	0.00	-67,521.04	4,161.98	0.00
04/01/2017	2,305.44			Monthly payment	10/01/2015	43,954.44						344,463.60	0.00	-67,521.04	4,161.98	0.00
04/18/2017			2,032.19	City tax disbursement	10/01/2015	43,954.44	0.00	0.00	-2,032.19		0.00	344,463.60	0.00	-69,553.23	4,161.98	0.00
05/01/2017	2,327.90			Monthly payment	10/01/2015	46,282.34						344,463.60	0.00	-69,553.23	4,161.98	0.00
06/01/2017	2,327.90			Monthly payment	10/01/2015	48,610.24						344,463.60	0.00	-69,553.23	4,161.98	0.00
06/02/2017		1,678.33		Payment	10/01/2015	48,610.24	0.00	0.00	0.00		1,678.33	344,463.60	0.00	-69,553.23	4,161.98	1,678.33
07/01/2017	2,327.90			Monthly payment	10/01/2015	50,938.14						344,463.60	0.00	-69,553.23	4,161.98	1,678.33
07/07/2017			2,154.06	City tax disbursement	10/01/2015	50,938.14	0.00	0.00	-2,154.06		0.00	344,463.60	0.00	-71,707.29	4,161.98	1,678.33
07/10/2017		1,678.33		Payment	10/01/2015	50,938.14	595.14	901.58	823.54		-641.93	343,868.46	0.00	-70,883.75	4,161.98	1,036.40
08/01/2017	2,327.90			Monthly payment	10/01/2015	53,266.04						343,868.46	0.00	-70,883.75	4,161.98	1,036.40
08/01/2017			0.00	Reversal	10/01/2015	53,266.04	-595.14	-901.58	-823.54		2,320.26	344,463.60	0.00	-71,707.29	4,161.98	3,356.66
08/01/2017			0.00	Reversal	10/01/2015	53,266.04	-52,526.86	0.00	0.00		0.00	396,990.46	0.00	-71,707.29	4,161.98	3,356.66
08/01/2017			0.00	Reversal	10/01/2015	53,266.04	0.00	0.00	0.00		52,526.86	396,990.46	0.00	-71,707.29	4,161.98	55,883.52
08/01/2017			0.00	Reversal	09/01/2015	56,622.70	-429.66	-1,067.06	-751.88		2,248.60	397,420.12	0.00	-72,459.17	4,161.98	58,132.12

Mortgage Proof of Claim Attachment: Additional Page

(12/15)

Case number:19-11906-VFP

Debtor 1:Luis R Solano

Part 5 : Loan Payment History from First Date of Default

Account Activity				How Funds Were Applied/Amount Incurred								Balance After Amount Received or Incurred				
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.	L.	M.	N.	O.	P.	Q.
Date	Contractual payment amount	Funds received	Amount incurred	Description	Contractual due date	Prin, int & esc past due balance	Amount to principal	Amount to interest	Amount to escrow	Amount to fees or charges	Unapplied funds	Principal balance	Accrued interest balance	Escrow balance	Fees / Charges balance	Unapplied funds balance
08/01/2017		1,678.33		Payment	09/01/2015	56,622.70	0.00	0.00	0.00		1,678.33	397,420.12	0.00	-72,459.17	4,161.98	59,810.45
08/03/2017		0.00		Payment	09/01/2015	56,622.70	0.00	0.00	9,999.99		-9,999.99	397,420.12	0.00	-62,459.18	4,161.98	49,810.46
08/03/2017		0.00		Payment	09/01/2015	56,622.70	0.00	0.00	9,999.99		-9,999.99	397,420.12	0.00	-52,459.19	4,161.98	39,810.47
08/03/2017		0.00		Payment	09/01/2015	56,622.70	0.00	0.00	9,999.99		-9,999.99	397,420.12	0.00	-42,459.20	4,161.98	29,810.48
08/03/2017		0.00		Payment	09/01/2015	56,622.70	0.00	0.00	9,999.99		-9,999.99	397,420.12	0.00	-32,459.21	4,161.98	19,810.49
08/03/2017		0.00		Payment	09/01/2015	56,622.70	0.00	0.00	9,999.99		-9,999.99	397,420.12	0.00	-22,459.22	4,161.98	9,810.50
08/03/2017		0.00		Payment	09/01/2015	56,622.70	0.00	0.00	4,775.51		-4,775.51	397,420.12	0.00	-17,683.71	4,161.98	5,034.99
08/24/2017			0.00	Reversal	09/01/2015	56,622.70	0.00	0.00	0.00		-1,678.33	397,420.12	0.00	-17,683.71	4,161.98	3,356.66
09/01/2017	2,327.90			Monthly payment	09/01/2015	58,950.60						397,420.12	0.00	-17,683.71	4,161.98	3,356.66
10/01/2017	2,327.90			Monthly payment	09/01/2015	61,278.50						397,420.12	0.00	-17,683.71	4,161.98	3,356.66
10/03/2017		0.00		Payment	09/01/2015	57,921.84	429.66	1,067.06	1,859.94		-3,356.66	396,990.46	0.00	-15,823.77	4,161.98	0.00
10/20/2017			2,113.51	City tax disbursement	10/01/2015	57,921.84	0.00	0.00	-2,113.51		0.00	396,990.46	0.00	-17,937.28	4,161.98	0.00
11/01/2017	2,339.22			Monthly payment	10/01/2015	60,261.06						396,990.46	0.00	-17,937.28	4,161.98	0.00
11/15/2017		1,678.33		Payment	10/01/2015	60,261.06	0.00	0.00	0.00		1,678.33	396,990.46	0.00	-17,937.28	4,161.98	1,678.33
12/01/2017	2,339.22			Monthly payment	10/01/2015	62,600.28						396,990.46	0.00	-17,937.28	4,161.98	1,678.33
01/01/2018	2,339.22			Monthly payment	10/01/2015	64,939.50						396,990.46	0.00	-17,937.28	4,161.98	1,678.33
01/04/2018		1,000.00		Payment	10/01/2015	62,619.24	431.00	1,065.72	823.54		-1,320.26	396,559.46	0.00	-17,113.74	4,161.98	358.07
01/04/2018		678.33		Payment	11/01/2015	62,619.24	0.00	0.00	0.00		678.33	396,559.46	0.00	-17,113.74	4,161.98	1,036.40
01/24/2018			2,082.99	City tax disbursement	11/01/2015	62,619.24	0.00	0.00	-2,082.99		0.00	396,559.46	0.00	-19,196.73	4,161.98	1,036.40
02/01/2018	2,339.22			Monthly payment	11/01/2015	64,958.46						396,559.46	0.00	-19,196.73	4,161.98	1,036.40
02/09/2018		1,678.33		Payment	11/01/2015	64,958.46	0.00	0.00	0.00		1,678.33	396,559.46	0.00	-19,196.73	4,161.98	2,714.73
02/12/2018		0.00		Payment	11/01/2015	62,638.20	432.34	1,064.38	823.54		-2,320.26	396,127.12	0.00	-18,373.19	4,161.98	394.47
03/01/2018	2,339.22			Monthly payment	12/01/2015	64,977.42						396,127.12	0.00	-18,373.19	4,161.98	394.47

Mortgage Proof of Claim Attachment: Additional Page

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Case number:19-11906-VFP

Debtor 1:Luis R Solano

Part 5 : Loan Payment History from First Date of Default

Account Activity				How Funds Were Applied/Amount Incurred							Balance After Amount Received or Incurred					
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.	L.	M.	N.	O.	P.	Q.
Date	Contractual payment amount	Funds received	Amount incurred	Description	Contractual due date	Prin, int & esc past due balance	Amount to principal	Amount to interest	Amount to escrow	Amount to fees or charges	Unapplied funds	Principal balance	Accrued interest balance	Escrow balance	Fees / Charges balance	Unapplied funds balance
03/02/2018			1,799.00	Hazard Insurance Disbursement	12/01/2015	64,977.42	0.00	0.00	-1,799.00		0.00	396,127.12	0.00	-20,172.19	4,161.98	394.47
03/16/2018		1,678.33		Payment	12/01/2015	64,977.42	0.00	0.00	0.00		1,678.33	396,127.12	0.00	-20,172.19	4,161.98	2,072.80
04/01/2018	2,339.22			Monthly payment	12/01/2015	67,316.64						396,127.12	0.00	-20,172.19	4,161.98	2,072.80
04/04/2018			1,880.52	City tax disbursement	12/01/2015	67,316.64	0.00	0.00	-1,880.52		0.00	396,127.12	0.00	-22,052.71	4,161.98	2,072.80
04/13/2018		1,678.33		Payment	12/01/2015	67,316.64	0.00	0.00	0.00		1,678.33	396,127.12	0.00	-22,052.71	4,161.98	3,751.13
04/16/2018		1,678.33		Payment	12/01/2015	67,316.64	0.00	0.00	0.00		1,678.33	396,127.12	0.00	-22,052.71	4,161.98	5,429.46
04/16/2018		0.00		Payment	12/01/2015	64,996.38	433.70	1,063.02	823.54		-2,320.26	395,693.42	0.00	-21,229.17	4,161.98	3,109.20
04/17/2018		0.00		Payment	01/01/2016	62,676.12	435.05	1,061.67	823.54		-2,320.26	395,258.37	0.00	-20,405.63	4,161.98	788.94
05/01/2018	2,339.22			Monthly payment	02/01/2016	65,015.34						395,258.37	0.00	-20,405.63	4,161.98	788.94
06/01/2018	2,339.22			Monthly payment	02/01/2016	67,354.56						395,258.37	0.00	-20,405.63	4,161.98	788.94
06/08/2018		1,678.33		Payment	02/01/2016	67,354.56	0.00	0.00	0.00		1,678.33	395,258.37	0.00	-20,405.63	4,161.98	2,467.27
06/11/2018		0.00		Payment	02/01/2016	65,038.92	436.41	1,060.31	818.92		-2,315.64	394,821.96	0.00	-19,586.71	4,161.98	151.63
07/01/2018	2,339.22			Monthly payment	03/01/2016	67,378.14						394,821.96	0.00	-19,586.71	4,161.98	151.63
07/04/2018			2,207.91	City tax disbursement	03/01/2016	67,378.14	0.00	0.00	-2,207.91		0.00	394,821.96	0.00	-21,794.62	4,161.98	151.63
07/23/2018		1,678.33		Payment	03/01/2016	67,378.14	0.00	0.00	0.00		1,678.33	394,821.96	0.00	-21,794.62	4,161.98	1,829.96
08/01/2018	2,339.22			Monthly payment	03/01/2016	69,717.36						394,821.96	0.00	-21,794.62	4,161.98	1,829.96
08/27/2018		1,678.33		Payment	03/01/2016	69,717.36	0.00	0.00	0.00		1,678.33	394,821.96	0.00	-21,794.62	4,161.98	3,508.29
08/28/2018		1,678.33		Payment	03/01/2016	69,717.36	0.00	0.00	0.00		1,678.33	394,821.96	0.00	-21,794.62	4,161.98	5,186.62
08/28/2018		0.00		Payment	03/01/2016	67,401.72	437.77	1,058.95	818.92		-2,315.64	394,384.19	0.00	-20,975.70	4,161.98	2,870.98
08/29/2018		0.00		Payment	04/01/2016	65,086.08	439.14	1,057.58	818.92		-2,315.64	393,945.05	0.00	-20,156.78	4,161.98	555.34
09/01/2018	2,339.22			Monthly payment	05/01/2016	67,425.30						393,945.05	0.00	-20,156.78	4,161.98	555.34
10/01/2018	2,339.22			Monthly payment	05/01/2016	69,764.52						393,945.05	0.00	-20,156.78	4,161.98	555.34
10/02/2018			484.04	Tax or Ins Corp advance (Other)	05/01/2016	69,764.52				484.04		393,945.05	0.00	-20,156.78	4,646.02	555.34

Mortgage Proof of Claim Attachment: Additional Page

(12/15)

Case number:19-11906-VFP

Debtor 1:Luis R Solano

Part 5 : Loan Payment History from First Date of Default

Account Activity				How Funds Were Applied/Amount Incurred								Balance After Amount Received or Incurred				
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.	L.	M.	N.	O.	P.	Q.
Date	Contractual payment amount	Funds received	Amount incurred	Description	Contractual due date	Prin, int & esc past due balance	Amount to principal	Amount to interest	Amount to escrow	Amount to fees or charges	Unapplied funds	Principal balance	Accrued interest balance	Escrow balance	Fees / Charges balance	Unapplied funds balance
10/04/2018			1,880.73	City tax disbursement	05/01/2016	69,764.52	0.00	0.00	-1,880.73		0.00	393,945.05	0.00	-22,037.51	4,646.02	555.34
10/15/2018		1,678.33		Payment	05/01/2016	69,764.52	0.00	0.00	0.00		1,678.33	393,945.05	0.00	-22,037.51	4,646.02	2,233.67
11/01/2018	2,344.92			Monthly payment	05/01/2016	72,109.44						393,945.05	0.00	-22,037.51	4,646.02	2,233.67
12/01/2018	2,344.92			Monthly payment	05/01/2016	74,454.36						393,945.05	0.00	-22,037.51	4,646.02	2,233.67
01/01/2019	2,344.92			Monthly payment	05/01/2016	76,799.28						393,945.05	0.00	-22,037.51	4,646.02	2,233.67
01/11/2019		0.00		Payment	05/01/2016	76,799.28	0.00	0.00	2,233.67		-2,233.67	393,945.05	0.00	-19,803.84	4,646.02	0.00
01/16/2019			2,114.28	City tax disbursement	05/01/2016	76,799.28	0.00	0.00	-2,114.28		0.00	393,945.05	0.00	-21,918.12	4,646.02	0.00
01/24/2019			50.00	Filing fees and court costs	05/01/2016	76,799.28				50.00		393,945.05	0.00	-21,918.12	4,696.02	0.00
01/30/2019				Bankruptcy Filed	05/01/2016	76,799.28						393,945.05	0.00	-21,918.12	4,696.02	0.00

Addendum Page

Basis for asserting that the applicable party has the right to foreclose: Debtor(s) executed a promissory note secured by a mortgage, deed of trust, or security deed. The Promissory note is either made payable to creditor or has been duly indorsed. Creditor, directly or through an agent, has possession of the promissory note. Creditor is the original mortgagee or beneficiary or the assignee of the mortgage, deed of trust, or security deed.

Additional Disclaimers (where applicable)**410**

Part 2: Question 9-Describe contains the property address and may contain a description for "Other".

410A**Part 1:**

Full creditor name cannot be displayed due to space limitation, see 410 part 1.1 for full name.

Part 2:

Principal Balance is from Part 5, Column M as of the Bankruptcy File Date.

Interest Due is the interest due as of the Bankruptcy File Date.

Fees, costs due is from Part 5, Column P as of the Bankruptcy File Date and includes any outstanding fees (i.e. late charges, property inspections) and cost (i.e. attorney costs), also included are corporate advances (i.e. tax, insurance) for non-escrowed loans as of the Bankruptcy File Date. Any fees, costs due that are incurred pre-petition and waived post-petition will not be included.

Escrow deficiency for funds advanced is from Part 5, Column O (if negative balance) as of the Bankruptcy File Date.

Other includes any applicable Private Mortgage Insurance, other Optional Products (i.e. A & H, Life) or Deferred Interest, where applicable, due as of the Bankruptcy File Date. This line was added to ensure transparency.

Less Total Funds on hand is the total of Part 5, Column O (if positive balance) and Q as of the Bankruptcy File Date.

Total Debt not to be used for payoff purposes.

Part 3:

Principal and Interest is the principal and interest portion of Part 5, Column G, as of the Bankruptcy File Date. (If post-petition payments are included as required by Local Rule or practice, this field will include post-petition principal and interest amounts).

Pre-Petition Fees Due is from Part 5, Column P as of the Bankruptcy File Date. Any fees, costs due that are incurred pre-petition and waived post-petition will not be included.

Escrow Deficiency for Funds Advanced is from Part 5, Column O (if negative balance) as of the Bankruptcy File Date.

Projected Escrow Shortage is the Escrow Required from the escrow analysis minus a positive escrow balance as of the Bankruptcy File Date. (If post-petition payments are included as required by Local Rule or practice, this field will include post-petition escrow amounts).

Other includes any applicable Optional Products (i.e. A & H, Life) due as of the bankruptcy file date. This line was added to ensure transparency. (If post-petition payments are included as required by Local Rule or practice, this field will include post-petition Optional Product amounts).

Less Funds on Hand is from Part 5, column Q as of the Bankruptcy File Date.

Part 4:

Optional Products includes any applicable optional products (i.e. A & H, Life) due as of the Bankruptcy File Date. This line was added to ensure transparency.

(*)This disclaimer has been added to the form to explain that the monthly payment amount may change periodically throughout the life of the loan.

Part 5:

If any of the transactions in the loan payment history contain amounts for optional products, the amount for that product will be reflected in either the Contractual payment amount or the Funds Received amount, and will be applied in those amounts. It will also be reflected in column G as described below.

Column G In addition to the items listed, this also includes any past due PMI or optional products (i.e. A & H, Life) amounts, as applicable. Optional product (i.e. A & H, Life) amounts will not be included in columns H-Q due to no appropriate column heading for this type of transaction.

Column J includes taxes, insurance and MIP/PMI as applicable.

Column N will only be populated if the loan is Daily Simple Interest or if Deferred Interest exists on the account.

Column O includes taxes, insurance and MIP/PMI as applicable.

This amended POC is being filed to add \$50.00 in fees, costs or charges in the total claim and arrearage amounts reflected in the original POC based on pre-petition billable items received after the previous claim was filed.

EXHIBIT B

STATISTICAL INFORMATION ONLY: Debtor must select the number of each of the following items included in the Plan.

☐ Valuation of Security ☐ Assumption of Executory Contract or Unexpired Lease ☐ Lien Avoidance

Last revised: September 1, 2018

**UNITED STATES BANKRUPTCY COURT
District of New Jersey**

In Re: Luis R. Solano

Case No.: 19-11906

Judge: VFP

Debtor(s)

CHAPTER 13 PLAN AND MOTIONS - AMENDED

☐ Original

☒ Modified/Notice Required

Date: June 10, 2019

☐ Motions Included

☐ Modified/No Notice Required

THE DEBTOR HAS FILED FOR RELIEF UNDER
CHAPTER 13 OF THE BANKRUPTCY CODE.

YOUR RIGHTS MAY BE AFFECTED

You should have received from the court a separate *Notice of the Hearing on Confirmation of Plan*, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the *Notice*. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the *Notice*. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

The following matters may be of particular importance. Debtors must check one box on each line to state whether the plan includes each of the following items. If an item is checked as "Does Not" or if both boxes are checked, the provision will be ineffective if set out later in the plan.

THIS PLAN:

☒ DOES ☐ DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

☐ DOES ☒ DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

☐ DOES ☒ DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

Initial Debtor(s)' Attorney RLI Initial Debtor: LRS Initial Co-Debtor _____

Part 1: Payment and Length of Plan

- a. The debtor shall pay 1,223.79 Monthly* to the Chapter 13 Trustee, starting on February 1, 2019 for approximately 60 months.
- b. The debtor shall make plan payments to the Trustee from the following sources:
- ☒ Future Earnings
 - ☐ Other sources of funding (describe source, amount and date when funds are available):
- c. Use of real property to satisfy plan obligations:
- ☐ Sale of real property
Description:
Proposed date for completion: _____
 - ☐ Refinance of real property:
Description:
Proposed date for completion: _____
 - ☐ Loan modification with respect to mortgage encumbering property:
Description:
Proposed date for completion: _____
- d. ☒ The regular monthly mortgage payment will continue pending the sale, refinance or loan modification.
- e. ☐ Other information that may be important relating to the payment and length of plan:

Part 2: Adequate Protection

☒ NONE

- a. Adequate protection payments will be made in the amount of \$ _____ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to _____ (creditor).
- b. Adequate protection payments will be made in the amount of \$ _____ to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: _____ (creditor).

Part 3: Priority Claims (Including Administrative Expenses)

- a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Creditor	Type of Priority	Amount to be Paid
Russell L. Low 4745	Attorney Fees	4,000.00

- b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:
Check one:
☒ None

☐ The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Creditor	Type of Priority	Claim Amount	Amount to be Paid
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Part 4: Secured Claims

a. Curing Default and Maintaining Payments on Principal Residence: ☐ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
WELLS FARGO HM MORTGAG	667 Summit Road Union, NJ 07083 Union County	79,026.16	0.00	79,026.16	2,339.74

b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears: ☒ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
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c. Secured claims excluded from 11 U.S.C. 506: ☒ NONE

The following claims were either incurred within 910 days before the petition date and are secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value:

Name of Creditor	Collateral	Interest Rate	Amount of Claim	Total to be Paid through the Plan Including Interest Calculation
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d. Requests for valuation of security, Cram-down, Strip Off & Interest Rate Adjustments ☒ NONE

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

NOTE: A modification under this section ALSO REQUIRES the appropriate motion to be filed under Section 7 of the Plan.

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to Be Paid
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-NONE-							
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2.) Where the Debtor retains collateral and completes the Plan, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

e. Surrender ■ NONE

Upon confirmation, the stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C 1301 be terminated in all respects. The Debtor surrenders the following collateral:

Creditor	Collateral to be Surrendered	Value of Surrendered Collateral	Remaining Unsecured Debt
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f. Secured Claims Unaffected by the Plan ■ NONE

The following secured claims are unaffected by the Plan:

Creditor

g. Secured Claims to be Paid in Full Through the Plan ■ NONE

Creditor	Collateral	Total Amount to be Paid through the Plan
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Part 5: Unsecured Claims ☐ NONE

a. **Not separately classified** allowed non-priority unsecured claims shall be paid:

- ☐ Not less than \$_____ to be distributed *pro rata*
- ☐ Not less than _____ percent
- ☒ *Pro Rata* distribution from any remaining funds

b. **Separately classified unsecured** claims shall be treated as follows:

Creditor	Basis for Separate Classification	Treatment	Amount to be Paid
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Part 6: Executory Contracts and Unexpired Leases ☒ NONE

(NOTE: See time limitations set forth in 11 U.S.C. 365(d)(4) that may prevent assumption of non-residential real property leases in this Plan.)

All executory contracts and unexpired leases, not previously rejected by operation of law, are rejected, except the following, which are assumed:

Creditor	Arrears to be Cured in Plan	Nature of Contract or Lease	Treatment by Debtor	Post-Petition Payment
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Part 7: Motions ☒ NONE

NOTE: All plans containing motions must be served on all potentially affected creditors, together with

local form, *Notice of Chapter 13 Plan Transmittal*, within the time and in the manner set forth in D.N.J. LBR 3015-1. A *Certification of Service, Notice of Chapter 13 Plan Transmittal and valuation* must be filed with the Clerk of Court when the plan and transmittal notice are served.

a. Motion to Avoid Liens under 11 U.S.C. Section 522(f). ■ NONE

The Debtor moves to avoid the following liens that impair exemptions:

Creditor	Nature of Collateral	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided
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b. Motion to Avoid Liens and Reclassify Claim from Secured to Completely Unsecured. ■ NONE

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified
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c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured. ■ NONE

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured
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Part 8: Other Plan Provisions

a. Vesting of Property of the Estate

- Upon Confirmation
□ Upon Discharge

b. Payment Notices

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

c. Order of Distribution

The Standing Trustee shall pay allowed claims in the following order:

- 1) Ch. 13 Standing Trustee Commissions
- 2) Other Administrative Claims
- 3) Secured Claims
- 4) Lease Arrearages
- 5) Priority Claims
- 6) General Unsecured Claims

d. Post-Petition Claims

The Standing Trustee ☐ is, ☒ is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

Part 9: Modification ☒ NONE

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being modified: February 13, 2019.

Explain below why the plan is being modified:

The Plan is being modified to cure mortgage arrears for \$79,026.16 to Wells Fargo as per the Proof of Claim through the Chapter 13 Plan.

Explain below how the plan is being modified:

The Plan is being modified by increasing trustee payment to \$1,559.94 starting June 1, 2019 to pay Wells Fargo mortgage arrears in full through the Chapter 13 Plan.

Are Schedules I and J being filed simultaneously with this Modified Plan? ☒ Yes ☐ No

Part 10 : Non-Standard Provision(s): Signatures Required

Non-Standard Provisions Requiring Separate Signatures:

☐ NONE

☒ Explain here:

*This plan is a step plan or has lumpsum payments as follows: \$1,223.79 per month for 4 months, then \$1,559.94 per month for 56 months

Any non-standard provisions placed elsewhere in this plan are ineffective.

Signatures

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Plan.

By signing and filing this document, the debtor(s), if not represented by an attorney, or the attorney for the debtor(s) certify that the wording and order of the provisions in this Chapter 13 Plan are identical to *Local Form, Chapter 13 Plan and Motions*, other than any non-standard provisions included in Part 10.

I certify under penalty of perjury that the above is true.

Date: June 10, 2019

/s/ Luis R. Solano

Luis R. Solano

Debtor

Date:

Joint Debtor

Date: June 10, 2019

/s/ Russell L. Low

Russell L. Low 4745

Attorney for the Debtor(s)

Certificate of Notice Page 7 of 8
 United States Bankruptcy Court
 District of New Jersey

In re:
 Luis R Solano
 Debtor

Case No. 19-11906-VFP
 Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-2

User: admin
 Form ID: pdf901

Page 1 of 2
 Total Noticed: 25

Date Rcvd: Jun 11, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jun 13, 2019.

db #+Luis R Solano, 667 Summit Road, Union, NJ 07083-7760
 cr +WELLS FARGO BANK, N.A., Phelan Hallinan & Schmieg, PC, 1617 JFK Boulevard, Suite 1400, Philadelphia, PA 19103-1814
 517998341 +ATLANTIC FEDERAL CRED, 37 MARKET ST, KENILWORTH, NJ 07033-1761
 517998343 +CAP1/SEAMN, 90 CHRISTIANA ROAD, NEW CASTLE, DE 19720-3118
 517998344 +CAPITAL ONE BANK USA N, PO BOX 965005, ORLANDO, FL 32896-5005
 517998347 ++GOLD KEY CREDIT INC, PO BOX 15670, BROOKSVILLE FL 34604-0122
 (address filed with court: GOLDKEY CRED, P O BOX 15670, BROOKSVILLE, FL 34604)
 517998348 +INDEPENDENT RECOVERY R, 24 RAILROAD AVE, PATCHOGUE, NY 11772-3518
 517998351 +PINNACLE LLC/RESURGENT, PO BOX 10497, GREENVILLE, SC 29603-0497
 517998350 +Phelan, Hallinan & Schmieg, P.C., 400 Fellowship Road, Suite 100, Mount Laurel, NJ 08054-3437
 517998352 +RICKART COLL SYSTEMS, 575 MILLTOWN RD, NORTH BRUNSWICK, NJ 08902-3336
 517998354 +THRIFT INVESTMENT CORP, 720 KING GEORGE POST RD, FORDS, NJ 08863-1985
 517998355 UNION CTY PROBATION, 32 WINFIELD SCOTT PLZ, ELIZABETH, NJ 07201
 517998358 ++WELLS FARGO BANK NA, WELLS FARGO HOME MORTGAGE AMERICAS SERVICING, ATTN BANKRUPTCY DEPT MAC X7801-014, 3476 STATEVIEW BLVD, FORT MILL SC 29715-7203
 (address filed with court: WELLS FARGO HM MORTGAG, 8480 STAGECOACH CIR, FREDERICK, MD 21701)
 517998359 +WFDS, PO BOX 1697, WINTERVILLE, NC 28590-1697
 518069562 Wells Fargo Bank, N.A., Wells Fargo Bank, N.A., Default Document Processing, MAC# N9286-01Y, 1000 Blue Gentian Road, Eagan MN 55121-7700

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
 smg E-mail/Text: usanj.njbankr@usdoj.gov Jun 11 2019 23:39:49 U.S. Attorney, 970 Broad St., Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534

smg +E-mail/Text: ustpregion03.ne.ecf@usdoj.gov Jun 11 2019 23:39:45 United States Trustee, Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100, Newark, NJ 07102-5235
 517998345 +E-mail/Text: bankruptcy@consumerportfolio.com Jun 11 2019 23:39:58 CONSUMER PORTFOLIO SVC, PO BOX 57071, IRVINE, CA 92619-7071
 517998346 +E-mail/PDF: creditonebknofications@resurgent.com Jun 11 2019 23:46:03 CREDIT ONE BANK NA, PO BOX 98872, LAS VEGAS, NV 89193-8872
 518009757 E-mail/PDF: resurgentbknofications@resurgent.com Jun 11 2019 23:46:07 LVNV Funding, LLC, Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587
 518009756 E-mail/PDF: resurgentbknofications@resurgent.com Jun 11 2019 23:47:36 Pinnacle Credit Services, LLC, Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587
 518044255 +E-mail/Text: JCAP_BNC_Notices@jcap.com Jun 11 2019 23:40:00 Premier Bankcard, Llc, Jefferson Capital Systems LLC Assignee, Po Box 7999, Saint Cloud Mn 56302-7999
 518009992 E-mail/Text: bnc-quantum@quantum3group.com Jun 11 2019 23:39:37 Quantum3 Group LLC as agent for, Sadino Funding LLC, PO Box 788, Kirkland, WA 98083-0788
 517998353 +E-mail/Text: bankruptcy@sw-credit.com Jun 11 2019 23:39:50 SOUTHWEST CREDIT SYSTE, 4120 INTERNATIONAL PARKWAY, CARROLLTON, TX 75007-1958
 517998357 +E-mail/Text: bnc-bluestem@quantum3group.com Jun 11 2019 23:40:16 WEBBANK/FINGERHUT, 6250 RIDGEWOOD RD, SAINT CLOUD, MN 56303-0820

TOTAL: 10

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****

517998356 WAKEFERN FEDERAL CR UN
 cr* +WELLS FARGO BANK, N.A., Phelan Hallinan & Schmieg, PC, 1617 JFK Boulevard, Suite 1400, Philadelphia, PA 19103-1814
 517998342* +ATLANTIC FEDERAL CRED, 37 MARKET ST, KENILWORTH, NJ 07033-1761
 517998349* +INDEPENDENT RECOVERY R, 24 RAILROAD AVE, PATCHOGUE, NY 11772-3518

TOTALS: 1, * 3, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '++' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

District/off: 0312-2

User: admin
Form ID: pdf901

Page 2 of 2
Total Noticed: 25

Date Rcvd: Jun 11, 2019

***** BYPASSED RECIPIENTS (continued) *****

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jun 13, 2019

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on June 10, 2019 at the address(es) listed below:

Marie-Ann Greenberg magecf@magtrustee.com
Nicholas V. Rogers on behalf of Creditor WELLS FARGO BANK, N.A. nj.bkecf@fedphe.com
Russell L. Low on behalf of Debtor Luis R Solano rbear611@aol.com,
ecf@lowbankruptcy.com;r57808@notify.bestcase.com
Sherri Jennifer Smith on behalf of Creditor WELLS FARGO BANK, N.A. nj.bkecf@fedphe.com,
nj.bkecf@fedphe.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 5

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

826604
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
856-813-5500
Attorneys for WELLS FARGO BANK, N.A.

In Re:

LUIS R. SOLANO

Case No: 19-11906 - VFP

Hearing Date: 07/18/2019

Judge: Vincent F. Papalia

Chapter: 13

CERTIFICATION OF SERVICE

1. I, Jessica Gregg:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC, who represents WELLS FARGO BANK, N.A. in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On June 24, 2019 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: June 24, 2019

/s/ Jessica Gregg
Jessica Gregg

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Luis R. Solano 667 Summit Road Union, NJ 07083	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Russell L. Low, Esquire 505 Main Street Suite 304 Hackensack, NJ 07601	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Marie-ann Greenberg, Trustee 30 Two Bridges Road Suite 330 Fairfield, NJ 07004	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
US Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	US Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.